

## LAW OFFICES OF JILL R. SHELL

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January 16, 2017

**BY ECF ONLY**

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**RE: *United States v. Tuzman (Irfan Amanat)***  
**15 Cr. 536 (PGG)**

Dear Judge Gardephe:

On January 10, 2017, Your Honor appointed me pursuant to the Criminal Justice Act to represent Irfan Amanat. At that time, Your Honor directed the defendants to confer and propose a motion schedule. Defense counsel conferred by conference call on Friday, January 13 to discuss a proposed schedule, and I advised that at this time I am unable to commit to a specific schedule.

The S8 Indictment returned on December 22, 2016, charges Mr. Irfan Amanat in four of six counts including conspiracy, wire fraud and securities fraud. Codefendant Kaleil Isaza Tuzman was charged in August 2015, and co-defendant Omar Amanat was charged in July 2016. Both Messrs. Isaza Tuzman and Omar Amanat were presented and arraigned in this District in July 2016. The Government represents that there are approximately 1.7 million documents that have already been produced to the codefendants to date and additional documents are expected to be produced. As of this writing I have received only two DVDs of documents (one of which I cannot access).

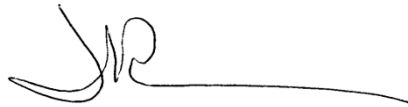
I understand that the Government and the other defendants have expressed a preference for unified briefing of pretrial issues. Until such time as I receive the discovery and at least start to “wrap my arms” around the allegations, the relevant parties, the transactions at issue, and the filings and other documents, I cannot commit to a motions schedule or reasonably expect to meet any deadline set at this time.

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Accordingly, I respectfully request that I be directed to inform Your Honor by letter when I receive the bulk of the discovery already produced to the other defendants, and four weeks thereafter I should be directed to submit a letter to Your Honor proposing a motions schedule on behalf of Irfan Amanat.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'JRS' followed by a long horizontal line.

Jill R. Shellow

cc: All counsel by ECF  
Mr. Irfan Amanat (by email)